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Attorneys for SECURED CREDITOR  
BRADLEY PROULX

CLERK, U.S. BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY            DEPUTY

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

In re:

SARA NEWSOME BURNS,

Debtor.

RICHARD KIPPERMAN, Trustee,

Plaintiff,

v.

BRADLEY PROULX, an individual,

Defendant.

Case No. 99-33191-B7

Adv. No: 01-90355-B7

Chapter 7

**NOTICE OF ADDENDUM TO CROSS-  
APPEAL**

TO THE CLERK OF THE COURT:

PLEASE TAKE NOTICE that attached hereto is a true and correct copy of the Judgment entered by the Court on January 7, 2002. The document was not available at the time of the filing of the Cross-Appeal.

Respectfully submitted,

DATE: January 17, 2002

**SAMPSON & ASSOCIATES**

By:

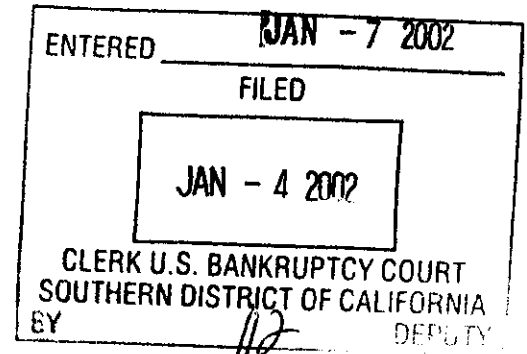


BRYAN D. SAMPSON, ESQ.  
Attorney for Secured Creditor  
BRADLEY PROULX

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2139 FIRST AVENUE  
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Attorneys for Creditor  
**BRADLEY PROULX**



**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

In re:

CASE NO. 99-33191-B7

**SARA NEWSOME BURNS,**

Debtor

**RICHARD KIPPERMAN, Trustee**

Adv. No.: 01-90355-B7

Chapter 7

Plaintiff,

**JUDGMENT**

v.

**BRADLEY PROULX, an individual**

Defendant.

Date: December 17, 2001

Time: 2:30 p.m.

Ctrm: 4

Judge: Hon. Peter W. Bowie

Defendant/Creditor BRADLEY PROULX's Motion for Summary Judgment came for hearing against Plaintiff/Chapter 7 Trustee RICHARD KIPPERMAN on the above date and time, the Honorable Peter W. Bowie presiding. Creditor BRADLEY PROULX appeared through his counsel, Elizabeth Aronson. Trustee RICHARD KIPPERMAN was present and appeared through his counsel, L. Scott Keehn. Upon reviewing the pleadings filed by the parties and hearing oral argument presented by both parties and awarding summary judgment in favor of Judgment Creditor BRADLEY PROULX;

The court's findings of fact and conclusions of law were stated orally by the Court, and recorded in open session, following the close of argument, and are incorporated herein by this reference pursuant to Rules 7052 and 9014 of the Federal Rules of Bankruptcy Procedure and Rule 52(a) of the Federal Rules of Civil Procedure.

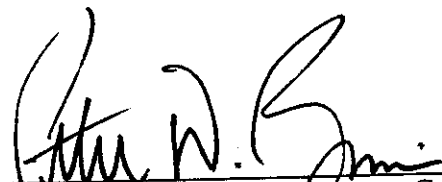
1-7-02  
 ENTERED IN JUDGMENT BOOK  
 VOLUME 186 PAGE 9

1 IT IS SO ORDERED that Defendant/Creditor BRADLEY PROULX shall have judgment  
2 against the bankruptcy estate of Chapter 7 Debtor Sara Newsome Burns.

3 IT IS HEREBY FURTHER ORDERED that the amount of Defendant/Secured Creditor  
4 BRADLEY PROULX's secured claim as of the date of the petition of August 11, 1999, in the amount  
5 of the \$150,000.00 cash fund, as defined in the complaint, plus interest accrued thereon.


6 IT IS SO ORDERED.

7  
8 DATED: JAN - 4 2002

  
Judge, United States Bankruptcy Court

9  
10 NOTICE: Signature by the attorney constitutes a certification under Federal Rule of Bankruptcy  
11 Procedure 9011 that the relief provided by the Order is the relief granted by the Court.

12 Submitted by:  
13 January 4, 2002

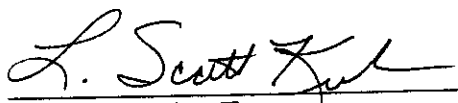
  
Bryan D. Sampson, Esq.

14  
15 Approved as to form.

16 DATED: 1-4-02

ROBBINS & KEEHN

17  
18 By:

  
L. Scott Keehn, Esq.  
Attorney for Plaintiff and  
Chapter 7 Trustee Richard Kipperman

CSD 3010 [04/28/96]  
 Name, Address, Telephone No. & I.D.  
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**UNITED STATES BANKRUPTCY COURT**

SOUTHERN DISTRICT OF CALIFORNIA  
 325 West "F" Street, San Diego, California 92101-6991

In Re

SARA NEWSOME BURNS

Debtor.

BANKRUPTCY NO. 99-33191-B7

RICHARD KIPPERMAN, Trustee

Plaintiff(s)

ADVERSARY NO. 01-90355-B7

v.

BRADLEY PROULX, an individual

Defendants(s)

**PROOF OF SERVICE**

I, Robin D'Orazio, certify that I am, and at all times during the service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made. I further certify that I served a copy of the following documents: Notice of Addendum to Cross-Appeal

on January 17, 2002 by:  
 [date]

☒ Mail Service - Regular, first class United States mail, postage fully pre-paid, addressed to:

L. Scott Keehn, Esq.  
 ROBBINS & KEEHN  
 530 "B" Street, Ste. 2400  
 San Diego, CA 92101

U.S. Trustee  
 Department of Justice  
 402 West Broadway, Suite 600  
 San Diego, CA 92101

☐ Personal Service - By leaving the documents with the following named person(s) or an officer or agent of the person(s) at:

☐ Residence Service - By leaving the documents with the following adult at:

Under penalty of perjury, I declare that the foregoing is true and correct.

1-17-02

[Date]

  
 [Signature]

Print Name	Robin D'Orazio
Business Address	SAMPSON & ASSOCIATES 2139 First Avenue
City, State, ZIP	San Diego, CA 92101